

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

MALIBU MEDIA, LLC,)
)
Plaintiff,) Civil Action Case No. 5:19-CV-00834-DAE
)
v.)
JOHN DOE,)
)
Defendant.)
)

**UNOPPOSED MOTION FOR EXTENSION OF RESPONSE DEADLINES TO MOTION
FOR PRELIMINARY INJUNCTION AND RENEWED MOTION TO MODIFY
SCHEDULING ORDER AND LEAVE TO AMEND ANSWER AND COUNTERCLAIMS**

Plaintiff Malibu Media, LLC request that the Court grant an extension of seven (7) days to file responses to the pending motion for preliminary injunction (CM/ECF 86) and the renewed motion to modify the scheduling order and for leave to amend answer and counterclaims. (CM/ECF 88.) This motion is unopposed.

Good cause exists to grant this motion for the following reasons:

1. On Tuesday, July 6, 2021, Defendant filed a motion for preliminary injunction to freeze assets. (CM/ECF 86.)
2. On Wednesday, July 7, 2021, Defendant filed a renewed motion to modify the scheduling order and for leave to amend answer, second amended counterclaims, and to join a counterdefendant. (CM/ECF 88.)
3. On Wednesday, July 7, 2021, the Court entered an Order setting the response deadline to Defendant's motion for preliminary injunction on Tuesday, July 13, 2021. (CM/ECF 89.) The Order also requires any reply to be filed on or before Tuesday, July 20, 2021. The Order also set an oral hearing on the motion for preliminary injunction on Monday, July 26, 2021.

Plaintiff, through undersigned counsel, respectfully requests an extension of seven days to respond to the motion for preliminary injunction and the motion to modify the scheduling order until Tuesday, July 20, 2021 and Wednesday, July 21, 2021 respectively.

The undersigned counsel's father passed away and counsel has been out of the office and out of Texas. As a result of the funeral and related events, counsel is in need of additional time to respond to the present motions along with many other work conflicts that are a result of the absence due to counsel's father's illness and death.

This request is not for delay, but rather so that justice may be done.

For these reasons, Plaintiff respectfully request that the Court grant the requested extension of time to respond to the motion for preliminary injunction until Tuesday, July 20, 2021 and to the motion to modify the scheduling order until Wednesday, July 21, 2021.

This motion is unopposed. A proposed order is attached.

Dated: July 9, 2021

Respectfully Submitted,

Beik Law Firm, PLLC

By: /s/ Paul S. Beik
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Counsel for Plaintiff, Malibu Media, LLC

CERTIFICATE OF CONFERENCE

On July 8, 2021, Plaintiff's counsel conferred with Defendant's counsel regarding the foregoing motion and the relief requested. The motion is unopposed.

By: /s/ Paul S. Beik
PAUL S. BEIK

CERTIFICATE OF SERVICE

I hereby certify that, on July 9, 2021, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF and that service was perfected on all counsel of record and interested parties through this system.

By: /s/ Paul S. Beik
PAUL S. BEIK